

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN DOES 151-166,	)	Case No. 2:20-cv-03817
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO PROCEED ANONYMOUSLY**

Plaintiffs hereby move the Court for an order permitting John Does 151-166 to proceed anonymously in this action in a manner identical to that approved by the Court in related cases. *See* Case No. 2:18-cv-00692, (“*Garrett*”), Doc. 67; Case No 2:18-cv-00736, Doc. 49 (“*Snyder-Hill*”); Case No. 2:19-cv-01911 (“*John Doe M.B.*”), Doc. 28; Case No. 2:19-cv-02237, (“*DiSabato*”), Doc. 26; Case No. 2:19-cv-02462 (“*Nutter*”), Doc. 28; Case No. 2:19-cv-03165 (“*John Does 37-66*”), Doc. 18; Case No. 2:19-cv-04433 (“*John Doe*”), Doc. 12; Case No. 2:19-cv-04397 (“*John Does 67-87*”), Doc. 12; Case No. 2:19-cv-04624 (“*John Does 88-94*”), Doc. 13; Case No. 2:19-cv-04634 (“*Beaudin*”), Doc. 10; Case No. 2:19-cv-05272 (“*Chrystal*”); Case No. 2:19-cv-04902 (“*Khalil*”), Doc. 28; Case No. 2:19-cv-05272 (“*Chrystal*”), Doc. 17; Case No. 2:19-cv-05418 (“*John Doe S.DL.*”), Doc. 16; Case No. 2:19-cv-5551 (“*de Jong*”), Doc. 11; Case No. 2:20-cv-01188 (“*John Does 140-150*”), Doc. 16; and Case No. 2:20-cv-01429 (“*John Doe II*”), Doc. 11. Defendant The Ohio State University (“Ohio State”) does not oppose plaintiffs’ motion at this time, but reserves its right to revisit the request for anonymity if subsequent case developments indicate otherwise to Ohio State.

The above-referenced orders properly balance plaintiffs’ privacy interests with defendant’s need to know the identities of the John Doe plaintiffs. Accordingly, the parties submit the attached

proposed order, which is consistent with the above-referenced orders.

For the foregoing reasons, plaintiffs request their motion be granted.

Respectfully submitted,

/s/ Richard W. Schulte

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Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on August 6, 2020. Notice was sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

/s/ Richard W. Schulte  
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